Kearney/Centaur Division
A.T. Kearney, Inc.
225 Reinekers Lane
P.O. Box 1438
Alexandria, Virginia 22313
703 548 4700
Facsimile 703 683 2407

Management
Consultants

ENVIRONMENTAL PROTECTION
AGENCY REGION II
89 OCT 17 AM 8:59
HAZARDOUS WASTE
PROGRAMS BRANCH

October 16, 1989

A.T. KEARNEY

CA89- 10/16/89

Mr. Ben Singh
Regional Project Officer
U.S. Environmental Protection Agency
Region II
26 Federal Plaza, Room 907
New York, NY 10278

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R02-01-07; GMC Fisher Guide Division; Syracuse, New York, EPA I.D. No. NY002239440; Revised Sampling Visit Work Plan and RFA Report; Work Plan

Dear Mr. Singh:

Enclosed please find the proposed work plan which you requested for the above-referenced work assignment. This work plan calls for the Kearney Team to review HWFB, NYSDEC, and ESD comments concerning the initial Sampling Visit Work Plan (SVWP) prepared under Contract No. 68-01-7038; submit a revised SVWP, ~~and revise the RFA report, prepared under the same contract, to reflect data collected~~ provide evaluation of sampling results and recommendations for RFI in a final ~~Mandatory~~ SV report.
during the Sampling Visit (SV).

All applicable A.T. Kearney conflict of interest avoidance procedures have been adhered to for the proposed firms and staffs.

Also enclosed is a work plan approval sheet which you should sign and return to Allen Pearce.

In accordance with the procedures for this contract, if the Contracting Officer has not provided written approval of this work plan by November 14, 1989, A.T. Kearney will stop work on this project. In these cases, A.T. Kearney will not resume work until the Contracting Officer approves the work plan.

Please feel free to call me or Steve Heikkila, the Kearney Team Work Assignment Manager (who can be reached at 612/227-6500), if you have any questions.

Sincerely,

George P. Dixon

George P. Dixon
Technical Director

cc: A. Pearce, EPA OSW
C. Chase, EPA Contracts
L. Negron, EPA Region II
A. Glazer
L. Poe
J. Atlas
D. LaRusso
S. Williamson
M. Ritter
W. Rohrer, DPRA

PROPOSED WORK PLAN

GMC FISHER GUIDE DIVISION
REVISED SAMPLING VISIT WORK PLAN AND RFA REPORT

Submitted by:

Kearney/Centaur Division
A.T. Kearney, Inc.
225 Reinekers Lane
Third Floor
Alexandria, VA 22314

Submitted to:

Mr. Ben Singh
Regional Project Officer
U.S. Environmental Protection Agency
Region II
26 Federal Plaza, Room 907
New York, NY 10278

In response to:

EPA Contract No. 68-W9-0040
Work Assignment No. R02-01-07

October 16, 1989

EPA Contract No. 68-W9-0040
Work Assignment No. R02-01-07
GMC Fisher Guide Division
Revised Sampling Visit Work Plan and RFA Report

Work Plan Revision No. 0
October 16, 1989

Regional Work Plan Approval

I have reviewed the attached work plan and find it meets our criteria for technical accuracy and properly reflects the scope of work and intended use of the deliverable(s), as described in the work assignment. The projected cost, staff hour estimates, and labor mix are also acceptable.

APPROVAL:

Luis A. Negrón (conditional approval) 11/6/89

EPA Regional Project Officer — Date

APPROVAL:

EPA Headquarters Project Officer — Date

APPROVAL:

EPA Contracting Officer — Date

CONCURRENCE:

A.T. Kearney Program Director — Date

EPA Contract No. 68-W9-0040
Work Assignment No. R02-01-07

Work Plan Revision No. 0
October 16, 1989

GMC FISHER GUIDE DIVISION
REVISED SAMPLING VISIT WORK PLAN AND RFA REPORT

WORK TO BE PERFORMED

The Kearney Team will address State and EPA comments concerning the draft Sampling Visit Work Plan (SVWP) previously developed for the GMC Fisher Guide Division facility under Contract No. 68-01-7038. Comments will be incorporated in a revised SVWP. Once approved by EPA Region II, a Sampling Visit (SV) will be conducted by the facility. ~~The results of the SV will be incorporated into a revised RCRA Facility Assessment (RFA) report for the facility. The revised RFA report will include~~ recommendations for further investigation at the facility, including a RCRA Facility Investigation (RFI), if warranted. Analytical work will be conducted under the CLP program; consequently, no analytical costs have been included in the budget proposed for this work plan.

SV report should be written providing sampling results and a final

PRIMARY INTENDED USE

The purpose of this project is to assist EPA Region II in determining what further corrective action activities are necessary at this facility. The deliverables will be worded as if written by EPA staff.

PROJECTS AND TASKS

The project will consist of the following tasks:

Task 01 - Prepare a work plan. This will include all preliminary contacts required for the preparation of the plan. The work plan budget estimate is based upon the draft SVWP submitted to EPA in February 1989, under Contract No. 68-01-7038.

Task 02 - Review comments from HWFB, NYSDEC, and ESD concerning the draft SVWP. Prepare a revised SVWP which incorporates the above review comments.

Task 03 - Upon receipt of the data from the SV, prepare ~~a revised RFA~~ SV report which incorporates the evaluation of the SV data and provides recommendations for further action at the facility, including an RFI, if warranted.

Task 98 - Perform a quality control review of the draft deliverables.

Task 99 - Provide management oversight for the project.

HEALTH AND SAFETY PLAN

No site visit is associated with this project; therefore, a health and safety plan is not required.

MONTHLY PROGRESS REPORT

Information regarding the status of this project will be included in the monthly progress reports A.T. Kearney, Inc., provides to EPA. The information will address:

- Work completed to date,
- Difficulties encountered and remedial action taken,
- Anticipated activity during the subsequent reporting period, and
- Sufficiency of authorized dollars and hours to complete the project.

QUALITY CONTROL PLAN

The Kearney Team Work Assignment Manager (KWAM) will conduct milestone checks on each task. In addition, draft project deliverables will be reviewed by a senior technical staff member of Kearney/Centaur Division to ensure quality and consistency with EPA regulations and policy.

STAFFING AND MANAGEMENT

Steve Heikkila of DPRA Incorporated will serve as the Kearney Team Work Assignment Manager.

Individual staff responsibilities are shown in Attachment I. The proposed staffing and task assignments for the project are shown in Attachment II. Hour allocations are shown for each task.

All applicable conflict of interest (COI) avoidance procedures have been adhered to for the proposed firms and staffs.

PERFORMANCE SCHEDULE

The project will be conducted according to the schedule shown in Attachment III.

COST ESTIMATE

The estimated cost for completing this project is included as Attachment IV.

BASIS FOR PERFORMANCE EVALUATION

The measures for evaluation of work assignment performance are described for each of the following performance criteria: technical quality; compliance with schedule; compliance with budget; management; and editorial quality. Measures for each of these criteria are discussed and agreed upon by the RPO and the Kearney Team WAM during the assignment planning process. To the extent possible, clear, quantitative measures will be established.

ATTACHMENT I

STAFF RESPONSIBILITY CHART

STAFF	ROLE	AREAS OF RESPONSIBILITY
G. Dixon	Technical Director	Management oversight
S. Williamson	Technical Assistant to the Technical Director	Administrative support, such as: perform COI checks, assemble and edit work plans, project tracking, general completeness review of deliverables, and distribute documents
J. Atlas	Regional Liaison	Initiate work, monitor project planning and implementation, and conduct project performance evaluation
D. LaRusso	Quality Control Reviewer	Senior-level technical review of final deliverables
S. Heikkila	Kearney Team Work Assignment Manager	Day-to-day management
A. Luebeck	Technical Staff	Preparation of revised SVWP and revised RFA report
B. Hendricks	Technical Staff	Preparation of revised SVWP and revised RFA report
W. Rohrer	Technical Staff	Preparation of work plan

EPA Contract No. 68-W9-0040
Work Assignment No. R02-01-07
GMC Fisher Guide Division
Revised Sampling Visit Work Plan and RFA Report

Work Plan Revision No. 0
October 16, 1989

ATTACHMENT II

STAFFING

Staff			Task					
Name	Firm[1]	Labor Category[2]	01	02	03	98[3]	99[4]	Total
Technical Director								
G. Dixon	ATK(KC)	P4	6	-	-	-	14	20
Work Assignment Manager								
S. Heikilla	DPRA	P3	8	-	-	-	20	28
Staffing								
J. Atlas	ATK	P4	6	-	-	-	6	12
S. Williamson	ATK(KC)	T2	8	-	-	-	12	20
W. Rohrer	DPRA	P4	6	-	-	-	-	6
A. Luebeck	DPRA	P2	-	20	30	-	-	50
B. Hendricks	DPRA	P2	-	20	30	-	-	50
Tech Support	DPRA		-	10	22	-	-	32
Quality Control								
D. LaRusso	ATK(KC)	P4	-	-	-	20	-	20
Tech Support	ATK(KC)		-	-	-	8	-	8
Totals			34	50	82	28	58	252
			19	34	62		48	163
								191

1/ ATK = A.T. Kearney, Inc.
ATK(KC) = Kearney/Centaur, a Division of A.T. Kearney, Inc.
DPRA = DPRA Incorporated

2/ Provides Labor Classification for Each Staff Person (e.g., P4, P3)

3/ Task 98 = Quality Control

4/ Task 99 = Project Management

ATTACHMENT III

SCHEDULE

Task	Milestone #	Description	Scheduled Date
01	01	Prepare work plan	10/16/89
02	02	Submit revised SVWP to QC for review	10/19/89
02	03	Submit QC comments on SVWP to KWAM	10/25/89
02	04	Submit revised SVWP to Technical Director	10/30/89
02	05	Submit revised SVWP to EPA	11/03/89
02	06	Submit revised ~~RFA~~ FINAL SV report to QC for comment	Contingent upon receipt of analytical results
99	07	Project management	In accordance with above milestones

ATTACHMENT IV

ESTIMATED COST

A.T. Kearney, Inc.		Hours	Cost
Labor		86	$ 3,940
Other Direct Costs			
Supplies	83		
Office Support Labor	55		
Photocopy	83		
Postage/Delivery	139		
Telephone/FAX	111		
Misc. Expense	83		
Total ODC Costs			$ 554
Subtotal			$ 4,494
DPRA Incorporated			
Labor		166	$ 6,221
Fee			$ 435
Other Direct Costs			
Photocopy	60		
Postage/Delivery	60		
Telephone/FAX	60		
Misc. Expense	60		
Total ODC Costs			$ 240
Subtotal			$ 6,896
SUBTOTAL			$11,390

ATTACHMENT IV (Cont'd)

ESTIMATED COST

	Hours	Cost
A.T. Kearney, Inc.		
Fee - 3% Base		$ 342
- 3% Award		342
Subtotal		$ 684
TOTAL ESTIMATED COST	252	$12,074

AVERAGE LABOR COST PER HOUR FOR ALL FIRMS	$40.32
WORK PLAN AVERAGE HOURLY RATE	$47.91

A.T. Kearney, Inc.
225 Reinekers Lane
P.O. Box 1405
Alexandria, Virginia 22313
703 836 6210
Facsimile 703 836 0547

Management
Consultants

ENVIRONMENTAL PROTECTION
AGENCY REGION II

89 FEB 17 PM 1:12

HAZARDOUS WASTE
PROGRAMS BRANCH

A.T. KEARNEY

February 16, 1989

Mr. Ben Singh
Regional Project Officer
U.S. Environmental Protection Agency
26 Federal Plaza, Room 907
New York, New York 10278

Reference: EPA Contract No. 68-01-7038; Work Assignment No. R02-01-52; General Motors Corporation, Fisher Guide Division (GMC Fisher Guide), Syracuse, New York; EPA ID No. NY002234440; Sampling and Analysis Plan

Dear Mr. Singh:

Enclosed please find the Sampling and Analysis Plan (S/A) for the above-referenced facility.

The S/A includes an introduction, the sampling parameters and rationale, the field and lab QA/QC procedures, sample handling, sampling procedures, and special training and health/safety considerations. The S/A calls for two background samples, seven samples at two SWMUs and two AOCs and five QC samples.

The sample locations described in the S/A are based on the VSI Summary Report previously submitted for this facility.

If you have any questions or comments, please feel free to call me or William Murphy Rohrer, the Work Assignment Manager (612/227-6500).

Yours truly,

James E Levin

James E. Levin
Technical Director

cc: L. Negron, EPA Region II
D. Bean
C. Saunders
K. Allison
W. Rohrer, DPRA

Doc #2085e

SAMPLING AND ANALYSIS PLAN

General Motors Corporation
Fisher Guide Division
Syracuse, New York

EPA I.D. No. NYD002234440

Prepared for:

U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Prepared by:

A. T. Kearney, Inc.
225 Reinekers Lane
Alexandria, Virginia 22314

and

DPRA Incorporated
245 East Sixth Street, Suite 813
St. Paul, Minnesota 55101

EPA Contract No. 68-01-7038
Work Assignment No. R02-01-52

February 1989

TABLE OF CONTENTS

TABLE OF CONTENTS

SAMPLING AND ANALYSIS PLAN

General Motors Corporation
Fisher Guide Division
Syracuse, New York

EPA I.D. No. NYD002234440

Prepared for:

U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, New York 10278

Prepared by:

A. T. Kearney, Inc.
225 Reinekers Lane
Alexandria, Virginia 22314

and

DPRA Incorporated
245 East Sixth Street, Suite 813
St. Paul, Minnesota 55101

EPA Contract No. 68-01-7038
Work Assignment No. R02-01-52

February 1989

1.0 INTRODUCTION

This Sampling and Analysis Plan (S/A) details the proposed procedures and rationale for soil and waste sampling at General Motors Corporation, Fisher Guide Division (GMC Fisher Guide), Syracuse, New York. A Visual Site Inspection (VSI) of this facility was conducted on January 18-19, 1989, and resulted in a recommendation for sampling of soils at two Solid Waste Management Units (SWMUs) and one Area of Concern (AOC) and sampling of oil stained crushed rock at one AOC.

The purpose of the sampling visit (SV) is to gather preliminary analytical data to fill data gaps that remain after completion of the VSI. The results from the sampling visit will be used to determine:

a) whether a release has occurred from the SWMU being sampled; and/or

b) whether any further action should be suggested.

Laboratory analysis will be completed by a laboratory designated by EPA's Contract Laboratory Program (CLP). The designated laboratory routinely operates according to the QA/QC protocols detailed in SW-846, "Test Methods for Evaluating Solid Wastes," Third Edition (EPA November 1986), and under CLP protocols detailed in the "User's Guide to the Contract Laboratory Program," Third Edition (EPA, December 1986).

This Sampling and Analysis Plan includes the following major sections:

- Sampling Parameters and Rationale
- Field and Lab QA/QC
- Sample Handling
- Sampling Procedures
- Special Training and Health/Safety Considerations

2.0 SAMPLING PARAMETERS AND RATIONALE

This section specifies the sampling criteria to be used for this sampling visit. These criteria include: (1) sampling points and (2) analytical requirements. The sampling points are defined by the

SWMU or AOC name and number and the sequence in which the SWMUs are to be sampled. The analytical requirements are described by the order of sample collection, the analytical parameters, the container type and size for each parameter, and the preservation method.

2.1 Identification of Sampling Points

Sampling will be conducted at the following SWMUs and AOCs:

- Drum Storage Area No. 2 (SWMU 4)
- Equalization Tank 1 (SWMU 44)
- Oil Stains Near the Wet Well (AOC C)
- Oil Stains Near the Industrial Waste Sump (AOC B)

Four soil samples will be collected on the south side of the Drum Storage Area No. 2 (SWMU 4). This area was used from 1964 to 1981 for the storage of 1,1,1-trichloroethane, trichloroethylene, paint solvents, and grease. During the VSI, oil stains were observed on the south side of the storage pad, adjacent to a sump located within the pad.

One soil sample will be collected on the east side of the Equalization Tank 1 (SWMU 44). During the VSI, oil staining was observed in this area. The oil apparently dripped from the rope skimmer used to remove oil from the tank.

One soil sample will be collected at the Oil Stains Near the Wet Well (AOC C). During the VSI, oil stains were observed in this area. The oil stain is approximately two feet wide and ten feet long. The stain appears to have resulted from leakage in adjacent piping.

One sample of crushed rock at the Oil Stains Near the Industrial Waste Sump (AOC B) will be collected. During the VSI, oil staining was observed in this area, beneath the opening of a clay pipe which emerges from an embankment on the north side of the Industrial Waste Sump. The source of the oil is not clear.

Two background soil samples will be collected. The tentative location of the background samples is the southeastern corner of the GMC Fisher Guide property, east of the parking lot. The suitability of the background soil locations will be verified during the sampling visit and new locations will be chosen at that time if necessary.

The sampling locations are shown in Figures 1 and 2.

The samples will be collected in the order of the sample numbers as described in Table 1. The sampling medium, the depth, the method and type, and the analysis parameters for each sample location are listed in Table 1.

2.2 Analytical Requirements

Samples from each sampling area will be containerized and preserved according to the Sample Collection Checklist (Table 2). One field blank will be prepared for each sample container type, using deionized or distilled water. Because all sampling equipment will be dedicated, only one set of equipment blanks for the trowels and one set for the ice pick heads will be filled at the beginning of the sampling visit. A duplicate soil sample will be collected at the Oil Stain Near the Wet Well (AOC C). A trip blank will be supplied by the laboratory for volatile organic analysis.

FIGURE 1. SAMPLING LOCATIONS

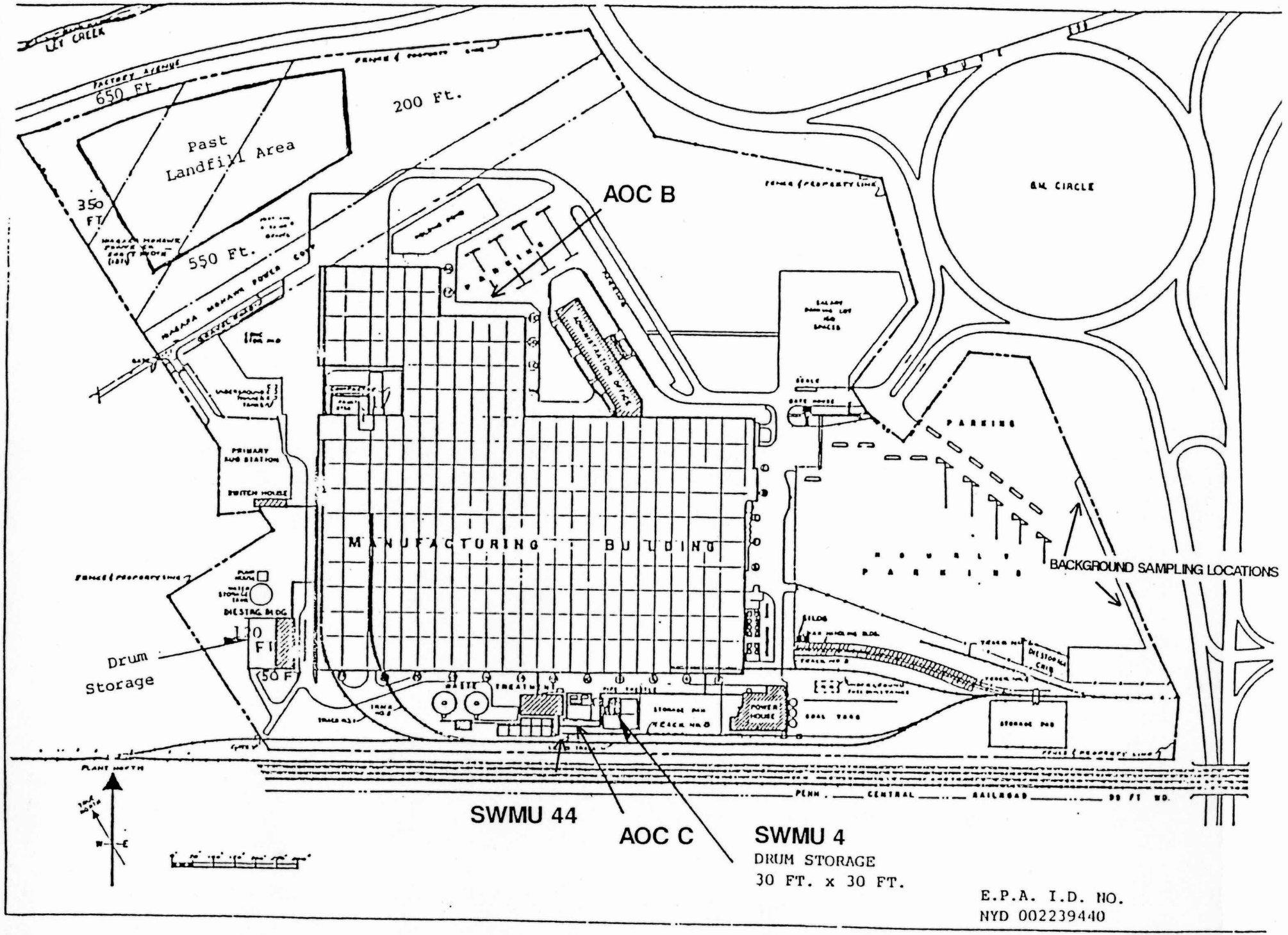


FIGURE 2. SAMPLING LOCATIONS

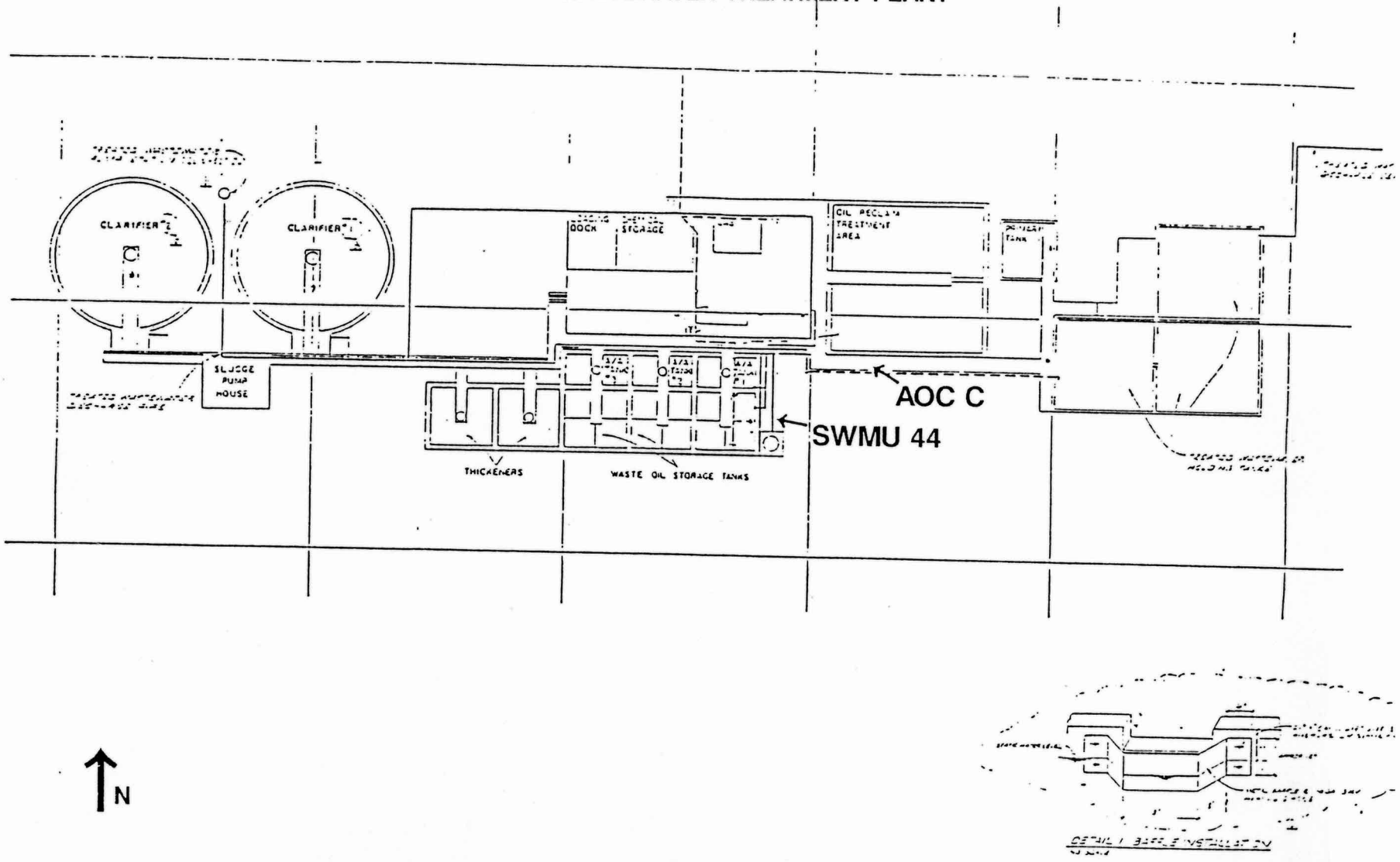


Table 1

SAMPLING LOCATIONS AND ANALYSIS PARAMETERS

GMC Fisher Guide
Syracuse, New York

Sample No.	Location	Sampling Medium	Depth	Method/ Type	Analysis Parameters
1	Equipment Blank (trowels)	Water	--	Discrete	Volatile organics, Semi-volatile organics, PCBs, Inorganics
2	Equipment Blank (ice pick heads)	Water	--	Discrete	Volatile organics, Semi-volatile organics, PCBs, Inorganics
3	Background	Soil	Surface to 6 inches	Spoon/Grab	Volatile organics, Semi-volatile organics, PCBs, Inorganics
4	Background	Soil	Surface to 6 inches	Spoon/Grab	Volatile organics, Semi-volatile organics, PCBs, Inorganics
5,6,7,8	Drum Storage Area No. 2 (SWMU 4)	Soil	Surface to 12 inches	Spoon/Grab	Volatile organics, Semi-volatile organics, PCBs, Inorganics,
9	Field Blank	Water	--	Discrete	Volatile organics, Semi-volatile organics, PCBs, Inorganics

Table 1 (Continued)

SAMPLING LOCATIONS AND ANALYSIS PARAMETERS

GMC Fisher Guide
Syracuse, New York

Sample No.	Location	Sampling Medium	Depth	Method/ Type	Analysis Parameters
10	Equalization Tank 1 (SWMU 44)	Soil	Surface to 6 inches	Spoon/Grab	Semi-volatile organics, PCBs, Inorganics
11,12	Oil Stains Near the Wet Well (AOC C) (duplicate)	Soil	Surface to 6 inches	Spoon/Grab	Semi-volatile organics, PCBs, Inorganics
13	Oil Stains Near the Industrial Waste Sump (AOC B)	Soil	Surface to 6 inches	Spoon/Grab	Semi-volatile organics, PCBs, Inorganics
14	Trip Blank	Water	--	Discrete	Volatile organics

Table 2

SAMPLE COLLECTION CHECKLIST

RAS Low-Level Water Samples (Equipment blank)

Parameter	Number and Size	Container[1]	Preservative
Volatile organics	2 x 40 ml	Glass vial	Cool, 4°C
Semi-volatile organics	1 x 80 oz.	Amber glass bottle	Cool, 4°C
PCBs	1 x 80 oz.	Amber glass bottle	Cool, 4°C
Total metals	1 x 1 liter	Polyethylene bottle	HNO_3 @ pH < 2; Cool, 4°C

RAS Low-Level Soil and Crushed Rock Samples

Parameter	Number and Size	Container[1]	Preservative
Volatile organics	2 x 120 ml	Glass vial	Cool, 4°C
Semi-volatile organics	1 x 8 oz.	Wide-mouth glass jar	Cool, 4°C
PCBs	1 x 8 oz.	Wide-mouth glass jar	Cool, 4°C
Total metals	1 x 8 oz.	Wide-mouth glass jar	Cool, 4°C

[1]All containers will be supplied with teflon-lined plastic caps.

3.0 FIELD AND LAB QA/QC

The reliability of the data generated from this sampling visit depends on the quality of the samples collected, the accuracy and completeness of the documentation and recordkeeping, and the validity and reproducibility of the analytical methods. In order to ensure reliable results, the following standard procedures will be used.

3.1 Equipment and Container Decontamination

All equipment to be used on site will be decontaminated prior to the sampling visit and will be packaged to effectively protect it from contamination during transit to and on the site. Designated stainless-steel trowels will be used for shallow soil sampling. In order to confine any possible release of hazardous agents to the smallest area, the area immediately surrounding the sampling point (within approximately a 10-foot radius) will be the designated "exclusion zone" (EZ). All sampling activities will be confined to the EZ. Immediately outside the EZ will be a designated "contamination reduction zone" (CRZ) which will contain equipment for decontamination of personnel, sampling equipment, and safety equipment. (Refer to the Health and Safety Plan for personnel decontamination procedures.)

The following procedure will be used to decontaminate sampling devices and field testing equipment prior to each use and, if necessary, to decontaminate the outer surface of containers of collected samples:

1. Remove gross contamination by wiping with an absorbent towel.
2. Scrub with nonphosphate detergent using a soft bristle brush.
3. Rinse with tap water.
4. Rinse twice with deionized water.
5. Allow to air dry thoroughly.

6. Wrap sampling devices and equipment in aluminum foil to protect from contamination until next use.

3.2 Waste Disposal

Prior to the sampling visit, GMC Fisher Guide will be contacted to arrange for on-site disposal of any waste generated during the Sampling Visit. Non-disposable items such as clothing will be effectively contained and decontaminated according to the procedures established in the Health and Safety Plan. The facility will provide a suitable container in which to collect any liquid waste generated during the sampling visit.

3.3 Sample Blanks

In order to verify that sampling techniques and procedures result in quality samples, three types of sample blanks will be submitted with the other field samples. These are: (1) field blanks, (2) equipment blanks, and (3) a trip blank.

3.3.1 Field Blanks

Field blanks will be used to determine whether contamination is introduced from sample collection activities, the sample containers, or from prevailing conditions at the site. Field blanks will be prepared on site between two soil sampling events by the field team using deionized or distilled water. A minimum of one set of field blanks will be prepared during the SV.

3.3.2 Equipment Blanks

Equipment blanks will be used to determine whether decontamination procedures have been effective in removing all contaminant residues from the sampling devices. One set of equipment blanks will be prepared by the field team with deionized or distilled water run over each sampling trowel and another set will be prepared by running deionized or distilled water over each ice pick. The deionized or distilled water will be transferred directly into sample containers. A set of equipment blanks will be prepared prior to the use or reuse of any sampling equipment.

3.3.3 Trip Blank

A trip blank will be used to determine whether samples are affected by migration of volatile organics during shipment to the laboratory for analysis. The trip blank will be supplied by the laboratory.

4.0 SAMPLE HANDLING

Proper handling of samples is essential to protect the analytical integrity of the samples, to definitively identify and track the samples, to comply with chain-of-custody requirements, and to secure the samples from damage or tampering.

4.1 Containers and Preservatives

Table 2 describes the container type and size. Preservation methods are limited to pH control, refrigeration, and the addition of chemical stabilizers. The containers will be provided through the CLP sample bottle repository. The sampling team will supply any necessary preservatives.

4.2 Sample Identification

To ensure proper identification and tracking of samples, each sample collected will be clearly and precisely marked, and the tag will be securely attached to the sample. The sampling location will be documented and the sample description and identification will be cross-referenced in the field logbook. Photographs and written descriptions of each sampling point will be recorded for verification.

4.3 Chain-of-Custody Documentation

A chain-of-custody record will be completed and will accompany each shipment of samples transported for laboratory analysis. A copy of this document will be retained by the field sampling team. The chain-of-custody record will be placed in a waterproof bag and taped to the underside of the lid of the ice chest being used for transport. The field sampling team will request an updated, signed copy of the chain-of-custody document upon delivery of samples to the receiving lab. An example of a chain-of-custody form is shown in Figure 3.

FIGURE 3

ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

CHAIN OF CUSTODY RECORD

PROJ. NO.	PROJECT NAME (use site code only)	NO. OF CONTAINERS	REMARKS
SAMPLERS: (Signature)			

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION

Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received by: (Signature)	Relinquished by: (Signature)	Date / Time	Received by: (Signature)
Relinquished by: (Signature)	Date / Time	Received for Laboratory by: (Signature)	Date / Time	Remarks	

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

0602

4.4 Special Handling

EPA will provide seals, tags, and all forms necessary to properly identify, secure, and process the samples. The appropriate CLP form, examples of which are shown in Figure 4 (RAS) and Figure 5 (SAS), will be completed and placed in a waterproof bag (with the chain-of-custody record) and taped to the inside lid of the ice chest. Custody seals will be applied to each sample container. The tagged samples will each be packaged securely in bubble-wrap to prevent breakage and all samples will be packaged inside a water-tight plastic bag. The bagged samples will be surrounded with ice inside the ice chest. A custody seal will be applied to each shipping container (ice chest). The samples will then be transported directly to the lab where the samples will be logged in and the chain-of-custody record will be signed by both parties.

5.0 SAMPLING PROCEDURES

Sampling activities will involve three general tasks:

1. Establishing the site safety parameters and defining the boundaries of the work zones.
2. Sample collection and decontamination procedures to ensure analytical integrity of the sample.
3. Sample documentation and shipment.

5.1 Site Safety Considerations

Before initiating any sampling activity, the air adjacent to the sampling point will be monitored to determine the potential for exposure to hazardous or toxic vapors. The levels of any toxic or combustible gases in the area will be measured with an OVA meter by the Site Safety Officer (SSO). Measurements will be recorded in the field logbook. The Site Safety Officer will determine the level of protection necessary to ensure the safety of the field team. No sampling activity will proceed without the approval of the Site Safety Officer. (Refer to the Health and Safety Plan (HASP) in Section 6.0 for detailed procedures.)

The area surrounding each sampling point will be inspected and all pertinent observations will be recorded, including any environmental factors which may affect the sampling process. Prior to and during sampling, measurements will be recorded in the field logbook.

FIGURE 4

RAS SAMPLE REPORT FORM

① Case Number:

Sample Site Name/Code:

② SAMPLE CONCENTRATION
(Check One)

___ Low Concentration
___ Medium Concentration

③ SAMPLE MATRIX
(Check One)

___ Water
___ Soil/Sediment

④ Ship To:

Attn:

Transfer
Ship To:

⑤ Regional Office: _____

Sampling Personnel:

(Name)

(Phone)

Sampling Date:

(Begin) (End)

⑥ For each sample collected specify number of containers used and mark volume level on each bottle.

	Number of Containers	Approximate Total Volume
Water (Extractable)		
Water (VOA)		
Soil/Sediment		
Water (Ext/VOA)		
Other		

⑦ Shipping Information

Name of Carrier

Date Shipped:

Airbill Number:

⑧ Sample Description

___ Surface Water ___ Mixed Media
___ Ground Water ___ Solids
___ Leachate ___ Other (specify) _____

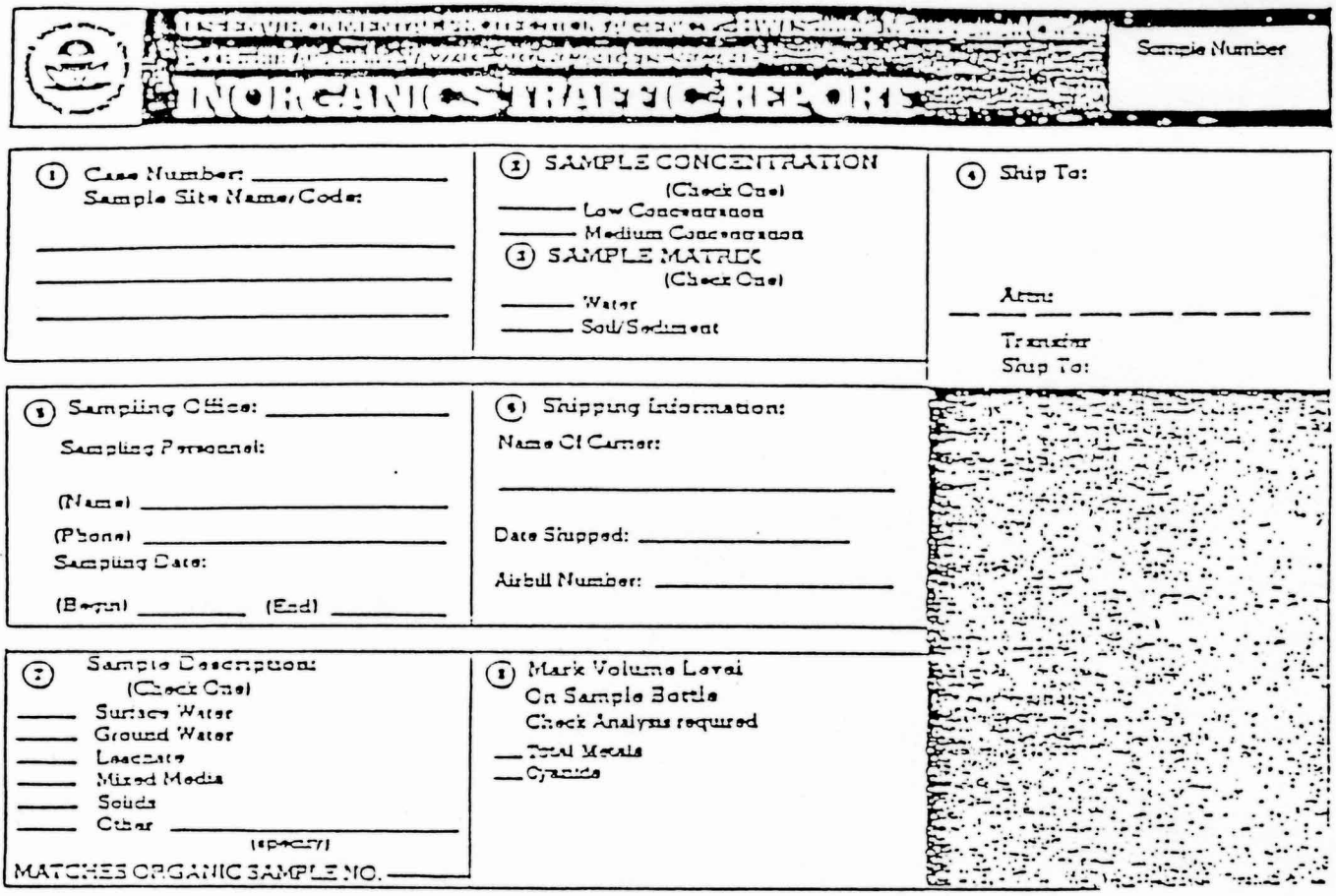
⑨ Sample Location

⑩ Special Handling Instructions:
(e.g., safety precautions, hazardous nature)

SMO COPY

FIGURE 4 (Continued)

RAS SAMPLE REPORT FORM



INORGANIC TRAFFIC REPORT

Sample Number

(1) Case Number: _____
Sample Site Name/Code:

(2) SAMPLE CONCENTRATION
(Check One)
_____ Low Concentration
_____ Medium Concentration

(3) SAMPLE MATRIX
(Check One)
_____ Water
_____ Soil/Sediment

(4) Ship To:

Attn:

Transfer
Ship To:

(5) Sampling Office: _____

Sampling Personnel:

(Name) _____

(Phone) _____

Sampling Date:

(Begin) _____ (End) _____

(6) Shipping Information:

Name Of Carrier:

_____

Date Shipped: _____

Airbill Number: _____

(7) Sample Description:
(Check One)
_____ Surface Water
_____ Ground Water
_____ Leachate
_____ Mixed Media
_____ Solids
_____ Other _____
(specify)

MATCHES ORGANIC SAMPLE NO. _____

(8) Mark Volume Level
On Sample Bottle
Check Analysis required
__ Total Metals
__ Cyanide

FIGURE 5

U.S. ENVIRONMENTAL PROTECTION AGENCY
CLP Sample Management Office
P.O. Box 818 - Alexandria, Virginia 22313
Phone: 703/557-2490 - FTS/557-2490

SAS Number

SPECIAL ANALYTICAL SERVICE

PACKING LIST

Sampling Office:	Sampling Date(s):	Ship To:	For Lab Use Only
Sampling Contact: (name)	Date Shipped:		Date Samples Rec'd:
(phone)	Site Code:	Attn:	Received By:

	Sample Numbers	Sample Description i.e., Analysis, Matrix, Concentration	Sample Condition on Receipt at Lab
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			

For Lab Use Only

White - SMO Copy, Yellow - Region Copy, Pink - Lab Copy for return to SMO, Gold - Lab Copy

The Site Safety Officer will delineate the boundaries of the exclusion zones (EZ), the contamination reduction zone (CRZ), and the support zone (SZ), and will monitor all sampling activities to ensure that the Health and Safety Plan is properly implemented.

5.2 Sampling Requirements

The following lists itemize the minimum anticipated requirements for field equipment and supplies. Prior arrangements will be made to ensure that all necessary equipment and supplies are available when the field team arrives at the site.

Field Equipment
OVA
Stainless steel spoons
Ice picks

Field Supplies
Sample containers and preservatives
Sample tags
Custody seals
Chain-of-custody forms
Lab forms
Clear plastic sheeting (4-mil)
Reagent-grade deionized water
Non-phosphate detergent
5-gallon plastic buckets
Polyethylene wash bottles (500 ml)
Bottle brushes, long handled
Paper towels
Aluminum foil
Trash bags (plastic)
Tap water (for equipment washing)
Plastic basins or tubs
Zip-loc bags (large)

Water-proof tape
Water-proof markers
Ice (obtain near site)
Ice chests
Stakes
Boundary tape
First aid kit
Emergency eyewash

5.3 Sample Collection

The Sample Collection Checklist given in Table 2 will be used as a guide to the sampling process. Samples will be collected in the order shown in Table 1 using the container and parameter specified in Table 2. Shallow soil samples will be collected using designated stainless-steel trowels. Snow and surface vegetation will be scraped from the ground surface. If the trowels won't penetrate frozen soils, an ice pick will be used to break up the soil. Dedicated ice pick heads will be used in order to eliminate the need for decontamination between sampling points and for additional equipment blanks. All samples will be collected in a manner so as to prevent cross-contamination of samples.

The following procedure will be followed to collect samples:

1. The volatile organic sample will be collected first and the semi-volatile organic sample will be collected second. The container will be filled completely so that no headspace is present.

2. The soil samples will be collected so that there is a minimum void space in the containers.

3. The exterior of the sample container will be decontaminated when necessary prior to further handling.

4. The sample label will be clearly and precisely completed and the tag will be attached to each sample as it is collected.

5. The chain-of-custody record, SAS forms, and the field logbook notations will be completed.

6.0 SPECIAL TRAINING AND HEALTH/SAFETY CONSIDERATIONS

All field personnel will be trained, experienced, and proficient in field sampling techniques, quality control procedures, health and safety protocols, and field documentation. The Site Safety Officer will ensure that the Health and Safety Plan (HASP) is effectively implemented and that all field personnel follow the procedures specified in the HASP.

6.1 The Health and Safety Plan

This Health and Safety Plan has been prepared in conformance with the DPRA Incorporated and A.T. Kearney (ATK) Safety and Health Programs. It addresses the activities associated with the soil and crushed rock sampling to be performed at the GMC Fisher Guide facility. The field team members must comply with this HASP during the sampling activity.

6.2 Project

6.2.1 Name of Facility: GMC Fisher Guide

Location: 1000 Town Line Road
Syracuse, New York

Telephone Number: (315) 432-5206

6.2.2 GMC Fisher Guide Manager of Manufacturing Engineering: Richard J. Larkin

Telephone Number: (315) 432-5206

6.2.3 A.T. Kearney Work Assignment Manager: William Murphy Rohrer

Telephone Number: (612) 227-6500

6.2.4 DPRA Incorporated Health/Safety Officer: Barbara Hendricks

Telephone Number: (612) 227-6500

6.2.5 Field Personnel:

Name: Audrey Luebeck
Affiliation: DPRA Incorporated
Assigned Task: Field Team Leader

Name: Barbara Hendricks
Affiliation: DPRA Incorporated
Assigned Task: Field Team Member/Site Safety Officer

Name: Craig Larson
Affiliation: DPRA Incorporated
Assigned Task: Field Team Member

6.3 Health and Safety Personnel

6.3.1 Health and Safety Personnel Designations

The following briefly describes the health and safety designations and general responsibilities which will be employed for the GMC Fisher Guide Sampling Visit.

6.3.2 Health and Safety Officer

The Health and Safety Officer (HSO) is responsible for the development of this HASP.

6.3.3 Site Safety Officer

The Site Safety Officer (SSO) is responsible for all safety procedures and operations at the site. The SSO will conduct air monitoring to determine that the proper level of personal protective equipment (PPE) is being used. The SSO will monitor all field team members for fatigue and cold stress. The SSO will ensure that the proper degree and type of PPE is being used for all workers according to the criteria established in this HASP. Updating equipment or procedures based on new information gathered during the field evaluation may be implemented at the discretion of the SSO. The SSO will direct all decontamination procedures for operating personnel. The SSO is responsible for stopping work as required to ensure personal safety and protection of property or where noncompliance with safety requirements is found in consultation with the Work Assignment Manager (WAM) and HSO. The SSO is responsible for notifying emergency services if necessary.

6.4 Facility Description

6.4.1 Location

General Motors Corporation, Fisher Guide Division (GMC Fisher Guide), Syracuse Plant, is located in Onondaga County, New York, at 1000 Town Line Road.

6.4.2 Facility Operations

Prior to the early 1970s, GMC Fisher Guide operations included plating, buffing, dye casting, and other metal forming and finishing processes. In 1973, GMC Fisher Guide removed all metal forming and finishing processes. The plant subsequently began producing plastic body and trim components manufactured by injection molding, painting, and assembly. Injection molding and painting of plastic parts resulted in the generation of PCB-contaminated hydraulic oils, waste solvents, and PCB-contaminated paint sludge.

6.4.3 Adjacent Land Use

Prior to 1952, when GMC constructed the Syracuse Plant, the property was undeveloped swamp land. The area to the south was previously farm land. Currently, the areas immediately adjacent to

the facility are industrial.

6.4.4 Climatic Conditions

The GMC facility is located in a climate zone characterized by cool winters and warm summers. The normal daily mean temperature during February is 24.0 degrees Fahrenheit. Annual normal precipitation in the Syracuse area is 39.11 inches, with a maximum normal of 3.77 inches in August and a minimum normal of 2.61 inches in January. The normal precipitation during February is 2.65 inches. The average wind speed during February is 11.0 miles per hour. The average relative humidity during February is 77 percent during the morning and 65 percent during the afternoon.

6.5 Hazard Evaluation

6.5.1 Physical Hazards

Field personnel should exercise caution when approaching the sampling sites and when in the vicinity of traffic. Footing may be poor around the Oil Staining Near the Industrial Waste Sump due to wet or icy weather conditions. Field personnel should dress appropriately to protect against the cold weather possible at this time of year.

6.5.2 Chemical Hazards

GMC Fisher Guide generates PCB-contaminated oils. The Drum Storage Area No. 2 managed waste solvents. Field personnel should exercise caution and use appropriate personal protective equipment, as discussed in Section 6.7.

6.6 Zonation of Work Site

The study area will be divided into three zones: exclusion zone, contamination reduction zone, and support zone. The Site Safety Office (SSO) will delineate each zone. For purposes of this project, the exclusion zone will be a restricted area around each sampling point. The size of the exclusion zone may vary depending on the number of people and types of equipment needed to sample. The size of the exclusion zone should provide ample room to maneuver. The SSO will determine an

appropriate size for the exclusion zone (a 10-foot radius around the sampling point is usually sufficient).

The contamination reduction zone (CRZ) will be outside the exclusion zone and will contain equipment for the decontamination of personnel, sampling equipment, and safety equipment (such as respirators). The first-aid kit and emergency eyewash will also be located in the CRZ. The location and size of the CRZ will be established at each sampling point by the SSO. Ingress/egress from the exclusion zone will be only through the CRZ.

The support zone is considered to be the uncontaminated or clean zone. Normal work clothes are appropriate only in this area. This zone is normally used for administrative operations.

6.7 Personal Protective Equipment

The level of protection to be worn by all field team members will be defined by this Health and Safety Plan (HASP) and implemented by the Site Safety Officer (SSO). Basic levels of protection for general operations are defined in this section. These levels may change depending on air monitoring results, site conditions, or other information. Changes to the protection levels beyond those listed in this HASP must be approved by the Health and Safety Officer (HSO). All field team personnel will complete a Medical Data Sheet, shown in Attachment A, prior to conducting any site activities. A copy of each Medical Data Sheet will be kept on file with the Health and Safety Officer and with the Site Safety Officer.

6.7.1 Levels of Protection

Field team members are required to wear modified Level D protection for all field sampling activities. Personal protective clothing will include:

- Hardhat
- Safety glasses
- Steel-toe and chemical-resistant boots
- Tyvek suit (warm clothing will be worn under the tyvek suit)
- Disposable latex gloves

- Butyl rubber booties
- Half-face or full-face twin cartridge respirator equipped with organic vapor and acid gas cartridge[a]

6.7.2 Monitoring

The SSO will utilize an Organic Vapor Analyzer (OVA) at the sampling site prior to and during sampling operations.

6.7.3 Decontamination

All field team members and equipment will be thoroughly decontaminated in the CRZ before leaving the site. All disposable gloves, disposable tyvek suits, and other disposable items will be placed in plastic bags and sealed. The facility will dispose of all waste generated during the SV. Non-disposable items and sampling equipment will be decontaminated according to the procedures presented in the Sampling Plan.

---

[a] Only to be used if 5 ppm or greater registers on the vapor meter.

MEDICAL DATA SHEET/FIELD TEAM REVIEW

Medical Data Sheet

This brief Medical Data Sheet will be completed by all field team personnel and will be kept in the Support Zone during the conduct of site operations. It is in no way a substitute for the Medical Surveillance Program requirements consistent with the A.T. Kearney Health and Safety Program for Hazardous Waste Sites. This data sheet will accompany any personnel when medical assistance is required or if transport to hospital facilities is required. If more information is required use the back of this sheet.

Project_____

Name_____ Home Telephone_____

Address_____

Company_____ Employee Number_____

Age_____ Height_____ Weight_____

Who to contact in case of emergency:_____

Address and telephone_____

Allergies_____

List medication taken regularly_____

Particular Sensitivities_____

Provide a Checklist of Previous Recent Illnesses or Exposures to

Hazardous Chemicals_____

Name of Personnel Physician_____ Telephone_____

Field Team Reviewer

I'am the person described above, I have read and reviewed the Site-Specific Health and Safety Plan and understand the information contained therein and will comply.

Name:_____

Signature:_____

Date:_____

CA 89-09/26/89

SEP 26 1989

Mr. George Dixon
A.T. Kearney
225 Reinekers Lane
Alexandria, VA 22314-001

Re: Resource Conservation and Recovery Act (RCRA)
RCRA Facility Assessment (RFA) and
Sampling Visit Work Plan (SVWP) up-date for:
GMC, Fisher Guide; EPA I.D. Number: NYD 002239440
GMC, Harrison Radiator, EPA I.D. Number: 980592901

Dear Mr. George Dixon:

Enclosed please find the comments by the Environmental Service Division (ESD) of the U.S. Environmental Protection Agency (EPA) and New York State Department of Environmental Conservation (DEC) on the referenced RFA and SVWP.

During the second quarter of FY'89, A.T. Kearney under EPA contract No. 68-01-7038 was scheduled to complete two RFAs and a SVWP for Envirotek, LTD., GMC, Fisher and GMC, Harrison, respectively.

As a part of this assignment, a draft SVWP was developed for GMC, Fisher. Please revise the SVWP per the enclosed comments, so that the sampling activity may commence as soon as possible. We are currently planning to have the facilities carry out the field work before November 15, 1989.

In the case of GMC Harrison, a Visual Site Inspection (VSI) was conducted which identified several previously unidentified SWMUs. As a result, it was decided by the EPA that a complete up-dated RFA must be implemented according to the recently revised work assignment.

Since A.T. Kearney, Inc. subcontractors, DPRA, Inc. and K.W. Brown, and Associates were involved with these facilities during the second quarter of FY'89, and since they know the status of these sites, we would like to have them finish these assignments. Specifically, we would like to have DPRA, Inc. work on the SVWP up-date for GMC, Fisher, and have K.W. Brown and Associates work on the GMC, Harrison RFA up-date.

Please be advised, we still have not received your revised Project Work Plans for the GMC, Fisher and GMC, Harrison Project. We will have to approve those workplans before specific project work can commence. Therefore, please forward these workplans as soon as possible.

We will be contacting you soon after your receipt of this letter to develop more specific schedules for this work.

If you have any question concerning this matter, please contact, Mr. Luis Negron, Project Engineer, at (212) 264-0994.

Sincerely yours,

Frank A. Langone, Chief
New York Facilities Section
Hazardous Waste Facilities Branch

Enclosure

cc: Paul Counterman, NYSDEC, Albany, w/encl.

bcc: F. Langone, 2AWM-HWF, w/encl.
L. Negron, 2AWM-HWF, w/encl.
L. Livingston, 2OPM-PAB, w/encl.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

4/4

DATE: March 31, 1989

SUBJECT: Review of RFA-SV Workplan for GMC Fisher Guide Division in Syracuse, N.Y.

FROM: David Dugan, Environmental Scientist
Source Monitoring Section

TO: Andrew Bellina, Chief
Hazardous Waste Facilities Branch

THRU: John Ciancia, Chief
Source Monitoring Section

Richard Spear, Chief
Surveillance and Monitoring Branch

I have reviewed the referenced document prepared by A.T. Kearney and DPRA Incorporated. Listed below are major problems and deficiencies with the workplan that need to be resolved.

In Section 3.1, Equipment and Container Decontamination, an acetone rinse followed by a pesticide-quality hexane rinse should follow Step 4, or the second rinse with deionized water.

In Section 4.1, Containers and Preservatives, did the sample containers, provided through the CLP sample bottle repository, meet EPA protocol and analyzed for quality control?

In Section 4.2, Sample Identification, preservatives and time of collection should be noted in the fieldbook and/or container(s).

In Section 5.1, Site Safety Considerations, air monitoring should be continuous throughout the sampling event because levels of toxic or hazardous vapors can change readily upon disturbance of the soils. It is also recommended that a flame ionization detector (FID) or a combustible gas indicator (CGI) be used in conjunction with an OVA meter while measuring the levels of any toxic or combustible gases in the area.

In Section 5.2, Sampling Requirements, and specifically under Field Equipment, the sampling trowels are not accounted for. What is the composition of the ice picks and the dedicated ice pick heads? Under Field Supplies, acetone and pesticide-quality hexane should be included. Paper to test for PH should be added to the inventory of field supplies.

In Section 6.7, Personal Protective Equipment, it is mentioned that field team members are required to wear half-face or full-face twin cartridge respirator equipped with organic vapor and acid gas cartridge. However, the criteria for selecting the use of a respirator are as follows:

1) Oxygen concentrations are not less than 19.5% by volume.

must be held to the extent practicable in the vicinity of the permitted facility.

(5) The public shall be provided 60 days to comment on the modification request. The comment period will begin on the date the permittee publishes the notice in the local newspaper. Comments should be submitted to the Agency contact identified in the public notice.

(6)(i) No later than 90 days after receipt of the notification request, the Director must:

(A) Approve the modification request, with or without changes, and modify the permit accordingly;

(B) Deny the request;

(C) Determine that the modification request must follow the procedures in § 270.42(c) for Class 3 modifications for the following reasons:

(*1*) There is significant public concern about the proposed modification; or

(*2*) The complex nature of the change requires the more extensive procedures of Class 3.

(D) Approve the request, with or without changes, as a temporary authorization having a term of up to 180 days, or

(E) Notify the permittee that he or she will decide on the request within the next 30 days.

(ii) If the Director notifies the permittee of a 30-day extension for a decision, the Director must, no later than 120 days after receipt of the modification request:

(A) Approve the modification request, with or without changes, and modify the permit accordingly;

(B) Deny the request; or

(C) Determine that the modification request must follow the procedures in § 270.42(c) for Class 3 modifications for the following reasons:

(*1*) There is significant public concern about the proposed modification; or

(*2*) The complex nature of the change requires the more extensive procedures of Class 3.

(D) Approve the request, with or without changes, as a temporary authorization having a term of up to 180 days.

(iii) If the Director fails to make one of the decisions specified in paragraph (b)(6)(ii) of this section by the 120th day after receipt of the modification request, the permittee is automatically authorized to conduct the activities described in the modification request for up to 180 days, without formal Agency action. The authorized activities must be conducted as described in the permit modification request and must be in compliance with all appropriate standards of 40 CFR Part 265. If the Director approves, with or without changes, or denies the modification request during the term of the temporary or automatic authorization provided for in paragraphs (b)(6) (i), (ii), or (iii) of this section, such action cancels the temporary or automatic authorization.

(iv)(A) In the case of an automatic authorization under paragraph (b)(6)(iii) of this section, or a temporary authorization under paragraph (b)(6) (i)(D) or (ii)(D) of this section, if the Director has not made a final approval or denial of the modification request by the date 50 days prior to the end of the temporary or automatic authorization, the permittee must within seven days of that time send a notification to persons on the facility mailing list, and make a reasonable effort to notify other persons who submitted written comments on the modification request, that:

(*1*) The permittee has been authorized temporarily to conduct the activities described in the permit modification request, and

(*2*) Unless the Director acts to give final approval or denial of the request by the end of the authorization period, the permittee will receive authorization to conduct such activities for the life of the permit.

(B) If the owner/operator fails to notify the public by the date specified in paragraph (b)(6)(iv)(A) of this section, the effective date of the permanent authorization will be deferred until 50 days after the owner/operator notifies the public.

(v) Except as provided in paragraph (b)(6)(vii) of this section, if the Director does not finally approve or deny a modification request before the end of the automatic or temporary authorization period or reclassify the modification as a Class 3, the permittee is authorized to conduct the activities described in the permit modification request for the life of the permit unless modified later under § 270.41 or § 270.42. The activities authorized under this paragraph must be conducted as described in the permit modification request and must be in compliance with all appropriate standards of 40 CFR Part 265.

(vi) In making a decision to approve or deny a modification request, including a decision to issue a temporary authorization or to reclassify a modification as a Class 3, the Director must consider all written comments submitted to the Agency during the public comment period and must respond in writing to all significant comments in his or her decision.

(vii) With the written consent of the permittee, the Director may extend indefinitely or for a specified period the time periods for final approval or denial of a modification request or for reclassifying a modification as a Class 3.

(7) The Director may deny or change the terms of a Class 2 permit modification request under paragraphs (b)(6) (i) through (iii) of this section for the following reasons:

(i) The modification request is incomplete;

(ii) The requested modification does not comply with the appropriate requirements of 40 CFR Part 264 or other applicable requirements; or

(iii) The conditions of the modification fail to protect human health and the environment.

(8) The permittee may perform any construction associated with a Class 2 permit modification request beginning 60 days after the submission of the request unless the Director establishes a later date for commencing construction and informs the permittee in writing before day 60.

(c) *Class 3 modifications.* (1) For Class 3 modifications listed in Appendix I of this section, the permittee must submit a modification request to the Director that:

(i) Describes the exact change to be made to the permit conditions and supporting documents referenced by the permit;

(ii) Identifies that the modification is a Class 3 modification;

(iii) Explains why the modification is needed; and

(iv) Provides the applicable information required by 40 CFR 270.13 through 270.21, 270.62 and 270.63.

(2) The permittee must send a notice of the modification request to all persons on the facility mailing list maintained by the Director and to the appropriate units of State and local government as specified in 40 CFR 124.10(c)(ix) and must publish this notice in a major local newspaper of general circulation. This notice must be mailed and published within seven days before or after the date of submission of the modification request, and the permittee must provide to the Director evidence of the mailing and publication. The notice must include:

(i) Announcement of a 60-day comment period, and a name and address of an Agency contact to whom comments must be sent;

(ii) Announcement of the date, time, and place for a public meeting on the modification request, in accordance with § 270.42(c)(4);

(iii) Name and telephone number of the permittee's contact person;

(iv) Name and telephone number of an Agency contact person;

(v) Location where copies of the modification request and any supporting

Metals	1 - liter poly bottle	HNO_3 pH < 2	6 months (Hg 26 days)

Soil Samples

BNA/PCB	1 - 8 oz wide mouth glass bottle	4°C	10 days until extraction 40 days until analysis
VOA	2 - 40 ml glass	4°C	10 days
Metals	1 - 8 oz wide mouth glass jar		6 months

NOTE: One sample per matrix per parameter must be triple volume to allow MS/MSD.

6. **Section 3.1**
The required decontamination procedure for all sampling equipment is:
a. wash and scrub with low phosphate detergent
b. tap water rinse
c. rinse with 10% HNO_3, ultrapure
d. tap water rinse
e. an acetone only rinse or a methanol followed by hexane rinse (solvents must be pesticide grade or better)
f. deionized demonstrated analyte free water rinse
g. air dry, and
h. wrap in aluminum foil, shiny side out, for transport.

Tap water may be used from any municipal water treatment system. The use of an untreated potable water supply is not an acceptable substitute.

7. **Section 3.3** All sampling trowels, mixing bowls, and ice picks must be made of stainless steel. VOA rinsate samples may not be composited. Blank water generated for use in Region II must be "demonstrated analyte-free". By this term we mean water of known quality which is defined by the Quality Assurance Office.

The criteria for analyte-free water is as follows. The assigned values for the contract required quantitation limits (CRQLs) can be found in the most recent CLP SOWs.

purgeable organics	< 10 ppb
semi-volatile organics	< CRQL
inorganics	< CRDL
PCBs	< CRQL

However, specifically for the common laboratory contaminants listed below, the allowable limits are three times the respective CRQLs.

methylene chloride
acetone
toluene
2-butanone
phthalates

Chittenden Cos., VT, Due: April 15, 1989, Contact: Ralph Abele, Jr. (617) 965-5100.

Published FR 11-13-87—Review period extended.

EIS No. 880152, Draft, USA, PRO, NAT, Nationwide Biological Defense Research Program, Continuation, Implementation, Due: October 4, 1988, Contact: Charles Dasey (301) 663-2732. Published FR 5-20-88-Review period extended.

EIS No. 880287, DSuppl, AFS, OR, ID, Wallowa Whitman National Forest, Land and Resources Management Plan, Additional Alternative, Implementation, Baker, Union, Wallowa, Grant, Malheur and Umatilla Counties, OR and Adams, Nez Perce and Idaho Counties, ID, Due: December 12, 1988, Contact: Bruce McMillan (503) 523-6319.

Published FR 9 9-88—Review period extended, incorrect date published in 9-9-88 FR.

Dated: September 20, 1988.

William D. Dickerson,

Deputy Director, Office of Federal Activities.

[FR Doc. 88-21862 Filed 9-22-88; 8:45 am]

BILLING CODE 6560-50-M

[FRL-3452-6]

Clarification of Interim Status Qualification Requirements for the Hazardous Components of Radioactive Mixed Waste

AGENCY: Environmental Protection Agency (EPA).

ACTION: Clarification notice.

SUMMARY: The Environmental Protection Agency (EPA) is today publishing a notice which clarifies requirements for facilities that treat, store or dispose of radioactive mixed waste to obtain interim status pursuant to Subtitle C of the Resource Conservation and Recovery Act (RCRA). Radioactive mixed wastes are wastes that contain both hazardous waste subject to RCRA and radioctive waste subject to the Atomic Energy Act (AEA). Additionally, this notice addresses "notification" requirements for handlers of radioactive mixed waste.

DATE: Owners and operators of facilities treating, storing, or disposing of radioactive mixed waste in States not authorized by September 23, 1988 to administer the Federal hazardous waste program in lieu of EPA must submit a RCRA Part A permit application to EPA by March 23, 1989 to qualify for interim status. Facilities treating, storing or disposing of radioactive mixed waste in States that received authorizatioin by September 23, 1988 are not subject to RCRA regulations until the State revises its existing authorized hazardous waste program to include authority to regulate radioactive mixed waste. Owners and operators must then comply with applicable State requirements regarding interim status.

To date, four States (i.e., Colorado, South Carolina, Tennessee, and Washington) have been authorized to regulate radioactive mixed wastes. In those States, owners and operators must comply with the applicable State law governing interim status for radioactive mixed waste facilities if it is more stringent than the otherwise applicable provisions of this notice.

FOR FURTHER INFORMATION CONTACT: Betty Shackleford, Office of Solid Waste (WH-563B), U.S. Environmental Protection Agency, 401 M Street SW., Washington, DC 20460, (202) 382-2221.

SUPPLEMENTARY INFORMATION:

A. Background

In 1976, the Resource Conservation and Recovery Act (RCRA) as amended, was passed to provide for development and implementation of a comprehensive program to protect human health and the environment from the improper management of hazardous waste. Specifically, Subtitle C of RCRA creates a managment system intended to ensure that hazardous waste is safely handled from the point of generation to final disposal. To acomplish this, Subtitle C requires the Agency first to define and characterize hazardous waste. Second, a hazardous waste manifest system was implemented to track the movement of hazardous waste from the point of generation to ultimate disposal. Hazardous waste generators and transporters must employ appropriate management practices and procedures to ensure the effective operation of the manifest system. Third, owners and operators of treatment, storage or disposal facilities (TSDF's) must comply with standards the Agency established under section 3004 of RCRA that "may be necessary to protect human health and the environment." These standards are implemented exclusively through permits issued to TSDF owners and operators by the Agency or authorized States. Until final permits are issued, treatment, storage, and disposal facilities must comply with the interim status regulations found in 40 CFR Part 265, which were promulgatd mostly on May 19, 1980.

Under RCRA interim status, the owner or operator of a TSDF may operate without a final permit if: (1) The facility existed on November 19, 1980 (or existed on the effective date of statutory or regulatory changes under RCRA that render the facility subject to the requirements to have a permit under section 3005); (2) the owner or operator complies with the notification requirements of section 3010 of RCRA: and (3) the owner or operator submits a RCRA Part A permit application (40 CFR 270.70). Interim status is retained until the Agency or authorized State makes a formal decision to issue or deny the final TSDF permit.

As provided by section 3006(b) of RCRA, States may apply to EPA for authorization to administer and enforce a hazardous waste program pursuant to Subtitle C of RCRA. Authorized State programs are carried out in lieu of EPA. To date, forty-four States have received final authorization to administer the basic hazardous waste program. Of these forty-four States, only four (i.e., Colorado, South Carolina, Tennessee, and Washington) have received the additional authorization needed to regulate radioactive mixed waste. In these States, which had base program authorization by July 3, 1986, the State's regulations on interim status for mixed waste facilities control.

The other forty States with base program authorization must still revise their existing programs to include authority to regulate the hazardous component of radioactive mixed waste. In the twelve States and trust territories (i.e., Alaska, American Samoa, California, Connecticut, Hawaii, Idaho, Iowa, Marianna Islands, Ohio, Puerto Rico, Virgin Islands, and Wyoming) *unauthorized* to carry out their own RCRA hazardous waste program, radioactive mixed waste is subject to Federal hazardous waste regulations administered by EPA.

Historically, substantial confusion and uncertainty have surrounded the applicability of RCRA to hazardous wastes containing certain radioactive materials (i.e., source, special nuclear or byproduct material as defined by the Atomic Energy Act of 1954, as amended (68 Stat. 923)). This uncertainty stemmed, to a large extent, from the exclusion of source, special nuclear and byproduct material from the definition of solid waste under section 1004(27) of RCRA.

To clarify State responsibilities with regard to the hazadous components of radioactive mixed waste, the EPA published a notice in the Federal Register of July 3, 1986 (51 FR 24504). That notice recognized that States had not previously been authorized under RCRA to regulate radioactive mixed waste because of continuing debate surrounding the extent of RCRA jurisdiction over this category of waste.

Copy for Cliff + Steve

The contractors shall maintain quality control records for each source of water which is used. These records shall demonstrate over time the presence/absence and level of contaminants found in each water supply. EPA personnel will randomly audit throughout the year the records kept by the generators/ contractors.

Delete trip blank and field blank.

One equipment rinsate blank should be used for the trowels, ice picks, mixing bowl, and spatula.

8. **Section 4.0** All samples must be shipped by an overnight delivery service within 24 hours of collection.

9. **Section 4.1** The pH of samples receiving pH preservation must be checked with pH paper.

10. **Section 5.2** The following items should be included in the list of field supplies: pH paper, HNO_3, HCl, decontamination solvents, and disposable gloves.

11. Samplers must use and change disposable gloves between sampling points.

identified as hazardous under 40 CFR Part 261 if he or she:

(i) Was in existence as a hazardous waste facility with respect to the newly listed or characterized waste on the effective date of the final rule listing or identifying the waste;

(ii) Submits a Class 1 modification request on or before the date on which the waste becomes subject to the new requirements;

(iii) Is in compliance with the standards of 40 CFR Part 265;

(iv) In the case of Classes 2 and 3 modifications, also submits a complete permit modification request within 180 days after the effective date of the rule listing or identifying the waste; and

(v) In the case of land disposal units, certifies that such unit is in compliance with all applicable Part 265 ground-water monitoring and financial responsibility requirements on the date 12 months after the effective date of the rule identifying or listing the waste as hazardous. If the owner or operator fails to clarify compliance with these requirements, he or she shall lose authority to operate under this section.

(2) New wastes or units added to a facility's permit under this subsection do not constitute expansions for the purpose of the 25 percent capacity expansion limit for Class 2 modifications.

(h) *Permit modification list.* The Director must maintain a list of all approved permit modifications and must publish a notice once a year in a State-wide newspaper that an updated list is available for review.

16. In § 270.62, the last sentence of paragraph (a) and the last sentence of paragraph (b)(10) are revised to read as follows:

§ 270.62 Hazardous waste incinerator permits.

(a) * * * The permit may be modified to reflect the extension according to § 270.42 of this chapter.

* * * * *

(b) * * *

(10) * * *

The permit modification shall proceed according to § 270.42.

* * * * *

17. In § 270.63, paragraph (d)(3) is removed and paragraphs (d)(1) and (d)(2) are revised to read as follows:

§ 270.63 Permits for land treatment demonstrations using field test or laboratory analyses.

* * * * *

(d) * * *

(1) This permit modification may proceed under § 270.42, or otherwise will proceed as a modification under § 270.41(a)(2). If such modifications are necessary, the second phase of the permit will become effective only after those modifications have been made.

(2) If no modifications of the second phase of the permit are necessary, the Director will give notice of his final decision to the permit applicant and to each person who submitted written comments on the phased permit or who requested notice of the final decision on the second phase of the permit. The second phase of the permit then will become effective as specified in § 124.15(b).

18. Section 270.42 is amended by adding Appendix I to read as follows:

§ 270.42 Permit modification at the request of the permittee.

* * * * *

Appendix I to § 270.42—Classification of Permit Modification

Modifications	Class
A. *General Permit Provisions*	
1. Administrative and informational changes	1
2. Correction of typographical errors	1
3. Equipment replacement or upgrading with functionally equivalent components (e.g., pipes, valves, pumps, conveyors, controls)	1
4. Changes in the frequency of or procedures for monitoring, reporting, sampling, or maintenance activities by the permittee:	
a. To provide for more frequent monitoring, reporting, sampling, or maintenance	2
b. Other changes	[1] 1
5. Schedule of compliance:	
a. Changes in interim compliance dates, with prior approval of the Director	3
b. Extension of final compliance date	[1] 1
6. Changes in expiration date of permit to allow earlier permit termination, with prior approval of the Director	[1] 1
7. Changes in ownership or operational control of a facility, provided the procedures of § 270.40(b) are followed	
B. *General Facility Standards*	
1. Changes to waste sampling or analysis methods:	
a. To conform with agency guidance or regulations	1
b. Other changes	2
2. Changes to analytical quality assurance/control plan:	
a. To conform with agency guidance or regulations	1
b. Other changes	2
3. Changes in procedures for maintaining the operating record	1
4. Changes in frequency or content of inspection schedules	2
5. Changes in the training plan:	
a. That affect the type or decrease the amount of training given to employees	2
b. Other changes	1
6. Contingency plan:	
a. Changes in emergency procedures (i.e., spill or release response procedures)	2
b. Replacement with functionally equivalent equipment, upgrade, or relocate emergency equipment listed	1
c. Removal of equipment from emergency equipment list	2
d. Changes in name, address, or phone number of coordinators or other persons or agencies identified in the plan	1
Note: When a permit modification (such as introduction of a new unit) requires a change in facility plans or other general facility standards, that change shall be reviewed under the same procedures as the permit modification.	
C. *Ground-Water Protection*	
1. Changes to wells:	
a. Changes in the number, location, depth, or design of upgradient or downgradient wells of permitted ground-water monitoring system	2
b. Replacement of an existing well that has been damaged or rendered inoperable, without change to location, design, or depth of the well	1
2. Changes in ground-water sampling or analysis procedures or monitoring schedule, with prior approval of the Director	[1] 1
3. Changes in statistical procedure for determining whether a statistically significant change in ground-water quality between upgradient and downgradient wells has occurred, with prior approval of the Director	[1] 1 [2] 2
4. Changes in point of compliance	3
5. Changes in indicator parameters, hazardous constituents, or concentration limits (including ACLs):	
a. As specified in the groundwater protection standard	2
b. As specified in the detection monitoring program	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: 24 AUG 1989

SUBJECT: Comments on GMC Fisher RFA Sampling Visit Workplan

FROM: Leon Lazarus, Environmental Scientist
Monitoring Management Branch

TO: Luis Negron, Project Manager
Hazardous Waste Facilities Branch

I have reviewed the GMC Fisher RFA Sampling Visit Workplan dated February 1989. These comments must be addressed before approval can be given. If you have any questions, please contact me at (FTS) 340-6778. My comments are as follows:

1. **Section 1.0** CLP protocols are different than SW-846 protocols. Who will validate the data?

2. **Section 2.1 and 5.3** Semi-volatile, PCBs, and metals samples should be homogenized in a stainless steel pan or glass bowl with a stainless steel spatula. Any rocks, twigs, leaves, or other debris should be removed from the sample before homogenization. VOA samples may not be homogenized.

3. **Section 2.2** Delete field blank and trip blank.

4. **Table 1:**
A. All samples collected should be analyzed for VOAs because some of the hazardous wastes generated at the facility are halogenated solvents.
B. One equipment rinse blank can be used for the trowels, ice picks, mixing bowl, and spatula. The second equipment rinsate blank should be deleted.

5. **Table 2** PCBs are a SAS analysis. Monitoring Management Branch must approve all SAS requests before they are submitted to SMO.

Table 2 should be changed as follows:

Parameter	Container	Preservative	Holding Time (VTSR)
	Water Samples		
BNA/PCB	4 - 1 liter glass bottles	4°C	5 days until extraction 40 days until analysis
VOA	2 - 40 ml glass vials	4°C*	10 days

*Adjust the pH of the sample to <2 by carefully adding 1:1 HCl drop by drop to the required 2 (40 ml) VOA sample vials. The number of drops of 1:1 HCl required should be determined on a third portion of sample water of equal volume.

It should be noted that if acidification of the sample causes effervescence, the sample should be submitted without preservation except for cooling to 4 degrees C. This sample property should be appropriately noted when present. The 1:1 HCl solution should be made up with demonstrated analyte-free deionized water.

Through that notice, EPA clarified its position that the hazardous component(s) of mixed waste was subject to RCRA regulation. Accordingly, States were required to revise their existing hazardous waste programs and apply for RCRA authorization to regulate radioactive mixed waste in accordance with the deadlines set forth in the July 3, 1986 notice. Similarly, such authority must now be sought by States initially submitting an application for RCRA final authorization.

Since publication of the July 3, 1986 notice, the Agency promulgated new deadlines for State hazardous waste program modifications (the "Cluster Rule," September 22, 1986, 51 FR 33712). This subsequent rulemaking established annual deadlines for States to submit program changes in groups or clusters when seeking Agency authorization. For State program changes occurring after June 1984, the groups or clusters were to correspond to successive twelve-month periods beginning each July 1 and ending June 30 of the following year. In accordance with the schedule established by the Cluster Rule, States which applied for final authorization before July 3, 1986 were required to revise existing hazardous waste programs to include the authority to regulate the hazardous component of radioactive mixed waste by July 1, 1988 (or by July 1, 1989 if a statutory amendment is necessary). States initially seeking final authorization after July 3, 1987 were required to seek authorization for radioactive mixed waste as part of their application for final authorization. Any State applying for HSWA corrective action must concurrently seek authority for radioactive mixed waste. The July 3, 1986 notice addressing RCRA's applicability to TSDF's handling radioactive mixed waste did not, however, address the issue of interim status.

B. Clarification of the Definition of Byproduct Material

At the same time that EPA's rules governing State programs for radioactive mixed waste were being developed and implemented, controversy arose over which wastes are mixed and therefore subject to RCRA and which wastes are pure "byproduct material" and therefore exempt from RCRA regulations as provided by section 1004(27). To delineate RCRA applicability to their byproduct material waste streams, the Department of Energy (DOE) issued an interpretive rule on May 1, 1987 (52 FR 15937). In that rule DOE stated that the term byproduct material as it applies to DOE-owned wastes (i.e., any radioactive material except special nuclear material yielded in or made radioactive by exposure to the radiation incident to the process of producing or utilizing special nuclear material) refers only to the actual radionuclides dispersed or suspended in the waste substance. That interpretation is consistent with the position issued on January 8, 1987 by the EPA and the Nuclear Regulatory Commission (NRC) in a document entitled "Guidance on the Definition and Identification of Commercial Mixed Low-Level Radioactive and Hazardous Waste and Answers to Anticipated Questions." Therefore, as DOE clarified in its May 1, 1987 byproduct rule, any matrix containing a RCRA hazardous waste as defined in 40 CFR 261 and a radioactive waste subject to the AEA is a radioactive mixed waste. Such wastes are subject to RCRA hazardous waste regulations regardless of further subclassification of the radioactive waste constituent as high-level, low-level, transuranic, etc.

C. Interim Status

As discussed previously, RCRA section 3005(a) prohibits treatment, storage, or disposal of hazardous waste without a permit after November 19, 1980. However, section 3005(e) of RCRA provides that facilities in existence on November 19, 1980 *or* on the date of statutory or regulatory changes which subject the facility to RCRA requirements, may continue treatment, storage, or disposal under "interim status" pending a final decision on its permit application.[1] To qualify for interim status under section 3005(e), the owner or operator of a TSDF in existence must submit a Part A permit application and meet applicable notification requirements under section 3010 of RCRA.

EPA has become aware that many TSDF's handling radioactive mixed waste, both in authorized and unauthorized States (EPA-administered hazardous waste programs), have been substantially confused about the regulatory status of their particular mix of hazardous waste. Further, these owners and operators are uncertain about how to qualify for interim status if they are handling radioactive mixed waste.

The July 3, 1986 notice addressing RCRA's applicability to TSDF's handling radioactive mixed waste did not address the issue of interim status. Given that omission and subsequent definitional clarifications on which radioactive waste streams are subject to RCRA regulation, EPA has determined that substantial confusion about interim status requirements existed. The primary purpose of this notice, therefore, is to clarify RCRA interim status requirements with respect to TSDF's managing radioactive mixed waste. The requirements are discussed below.

1. Requirement That Facilities Be "in Existence"

Interim status provides temporary authorization to continue hazardous waste management activities at facilities engaging in such activities at the time that they first become subject to RCRA regulation. Without interim status, the activities would have to cease until a permit application was filed and reviewed and final permit issued.

One of the conditions for qualifying for interim status under section 3005(e) is that the facility be "in existence" either on November 19, 1980 or on the date of the regulatory or statutory change which first subjects the facility to RCRA permitting requirements. Under EPA regulations at 40 CFR 260.10 and 270.2, to be "in existence" (i.e., to be an existing hazardous waste management facility or existing facility) means that the facility is either operating or construction of such a facility has commenced on the relevant date.

As applied to facilities handling radioactive mixed waste in States unauthorized to implement a hazardous waste program (i.e., without base program authorization) as of the date of this notice, EPA believes that facilities in operation or under construction as radioactive mixed waste treatment, storage, or disposal facilities on July 3, 1986 may qualify for interim status under section 3005(e)(1)(A)(ii) of RCRA. The Agency interprets this provision as applying to such facilities in existence on July 3, 1986 because the July 3, 1986 notice was EPA's first official pronouncement to the general public that RCRA permitting requirements are applicable to radioactive mixed waste. In view of the level of confusion surrounding regulation of radioactive mixed waste prior to that time, EPA will treat the July 3, 1986 notice as the relevant regulatory change for establishing that facilities in existence

[1] However, if a *facility* has previously had its interim status terminated, the facility is barred by statute from qualifying for interim status for a newly listed waste (RCRA section 3005(e)(1)). If only certain *units* at the facility have previously had interim status terminated, then the facility may operate newly-regulated units under interim status (see 40 CFR 270.72).